

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

UNITED STATES OF AMERICA

CRIMINAL NO. 2:24-cr-196

v.

TREVOR COURTNEY FISHBURNE

a/k/a "Shi Town"

a/k/a "Shi"

ZAQUANN ERNEST HAMPTON

a/k/a "Tob"

JAZIAH SAMONE DRESHA LEWIS

JAMIE BROWN

a/k/a "Scrap"

STEPHANIE AMBER HAWKINS

OSHALUM GRANT

a/k/a "O Dog"

MATTHEW RASHAUN JONES

a/k/a "Savage"

BRIANNA ALNISA LAWRENCE

a/k/a "Bri"

RASHAWN LYMEL BROWN

a/k/a "Strap"

BRITTANEY SMITH

JAMES JOSEPH YOUNG, III

a/k/a "JJ"

WANDA CATRECE FISHBURNE

JADEN TYRONE SMITH

RICHARD VERNON DEAS

SHANIYA PAULESHA JAQUAIL BROWN

JESUS HERIBERTO RAMIREZ GUZMAN

18 U.S.C. 2

18 U.S.C. 922(d)

18 U.S.C. 922(g)(1)

18 U.S.C. 924(a)(8)

18 U.S.C. 924(c)(1)(A)(i)

18 U.S.C. 924(c)(1)(B)(i)

18 U.S.C. 1956(a)(1)(B)(i)

18 U.S.C. 1956(h)

18 U.S.C. 1957

21 U.S.C. 841(a)(1)

21 U.S.C. 841(b)(1)(A)

21 U.S.C. 841(b)(1)(B)

21 U.S.C. 841(b)(1)(C)

21 U.S.C. 846

21 U.S.C. 851

26 U.S.C. 5822

26 U.S.C. 5861(c)

26 U.S.C. 5871

18 U.S.C. 924(d)(1)

18 U.S.C. 982(a)(1)

21 U.S.C. 853

21 U.S.C. 881

26 U.S.C. 5872

49 U.S.C. 80303

28 U.S.C. 2461(c)

**SUPERSEDING INDICTMENT
(UNDER SEAL)**

COUNT 1

THE GRAND JURY CHARGES:

That beginning at a time unknown to the grand jury, but beginning at least in or around August 2019, and continuing thereafter, up to and including the date of this Superseding

Indictment, in the District of South Carolina, the Defendants, **TREVOR COURTNEY FISHBURNE**, a/k/a “Shi Town”, a/k/a “Shi”; **ZAQUANN ERNEST HAMPTON**, a/k/a “Tob”; **JAZIAH SAMONE DRESHA LEWIS**; **JAMIE BROWN**, a/k/a “Scrap”; **STEPHANIE AMBER HAWKINS**; **OSHALUM GRANT**, a/k/a “O Dog”; **MATTHEW RASHAUN JONES**, a/k/a “Savage”; **BRIANNA ALNISA LAWRENCE**, a/k/a “Bri”; **RASHAWN LYMEL BROWN**, a/k/a “Strap”; **BRITTANEY SMITH**; **JAMES JOSEPH YOUNG, III**, a/k/a “JJ”; **WANDA CATRECE FISHBURNE**; **JADEN TYRONE SMITH**; **RICHARD VERNON DEAS**; and **SHANIYA PAULESHA JAQUAIL BROWN** knowingly and intentionally did combine, conspire, agree and have tacit understanding with each other and others, both known and unknown to the grand jury, to knowingly, intentionally and unlawfully possess with intent to distribute and distribute cocaine, cocaine base (commonly known as “crack” cocaine), N-phenyl-N- [1- (2-phenylethyl) -4-piperidiny l] propenamide (commonly known as fentanyl), and methamphetamine, all Schedule II controlled substances, and heroin and 3,4-methylenedioxymethamphetamine (commonly known as “MDMA” or ecstasy), all Schedule I controlled substances;

- a. With respect to **TREVOR COURTNEY FISHBURNE**, a/k/a “Shi Town”, a/k/a “Shi”, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 5 kilograms or more of cocaine; 50 grams or more of methamphetamine; 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N- [1- (2-phenylethyl) -4-piperidiny l] propenamide (commonly known as fentanyl), and a quantity of 3,4-methylenedioxymethamphetamine (commonly known as “MDMA” or

ecstasy), in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(C);

- b. With respect to **ZAQUANN ERNEST HAMPTON, a/k/a "Tob"**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 50 grams or more methamphetamine, 500 grams or more of cocaine, 500 grams or more of cocaine base (commonly known as "crack cocaine"), 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N- [1- (2-phenylethyl) -4-piperidinyl] propenamide (commonly known as fentanyl), and a quantity of heroin, and a quantity of 3,4-methylenedioxymethamphetamine (commonly known as "MDMA" or ecstasy), in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(B), and 841(b)(1)(C);
- c. With respect to **JAZIAH SAMONE DRESHA LEWIS**, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is 50 grams or more of methamphetamine, 500 grams or more of cocaine, and 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N- [1- (2-phenylethyl) -4-piperidinyl] propenamide (commonly known as fentanyl), in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and 841(b)(1)(B);
- d. With respect to **JAMIE BROWN, a/k/a "Scrap"**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 5 kilograms or more of cocaine, a quantity of cocaine base (commonly known as "crack cocaine"), and a quantity of a

- mixture or substance containing a detectable amount of N-phenyl-N- [1- (2-phenylethyl) -4-piperidinyl] propenamide (commonly known as fentanyl), in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(C);
- e. With respect to **STEPHANIE AMBER HAWKINS**, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is 50 grams or more of methamphetamine and 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N- [1- (2-phenylethyl) -4-piperidinyl] propenamide (commonly known as fentanyl), in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(B);
- f. With respect to **OSHALUM GRANT, a/k/a “O Dog”**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is a quantity of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C);
- g. With respect to **MATTHEW RASHAUN JONES, a/k/a “Savage”**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a quantity of cocaine, a quantity of cocaine base (commonly known as “crack cocaine”), a quantity of 3,4-methylenedioxymethamphetamine (commonly known as “MDMA” or ecstasy), and a quantity of a mixture or substance containing a detectable amount of N-phenyl-N- [1- (2-phenylethyl) -4-piperidinyl] propenamide (commonly known as

fentanyl), in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and 841(b)(1)(C);

- h. With respect to **BRIANNA ALNISA LAWRENCE, a/k/a "Bri"**, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is 50 grams or more of methamphetamine and a quantity of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(C);
- i. With respect to **RASHAWN LYMEL BROWN, a/k/a "Strap"**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine and 500 grams or more of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(B);
- j. With respect to **BRITTANEY SMITH**, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is 500 grams or more of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B);
- k. With respect to **JAMES JOSEPH YOUNG, III, a/k/a "JJ"**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 5 kilograms or more of cocaine, 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, and a quantity of cocaine base (commonly known as "crack

cocaine”), in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(C);

- l. With respect to **WANDA CATRECE FISHBURNE**, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is 500 grams or more of cocaine, a quantity of a mixture or substance containing a detectable amount of N-phenyl-N- [1- (2-phenylethyl) -4-piperidiny] propenamide (commonly known as fentanyl), and a quantity of cocaine base (commonly known as “crack cocaine”), in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and 841(b)(1)(C);
- m. With respect to **JADEN TYRONE SMITH**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 500 grams or more of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B);
- n. With respect to **RICHARD VERNON DEAS** , the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 50 grams or more of methamphetamine and 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N- [1- (2-phenylethyl) -4-piperidiny] propenamide (commonly known as fentanyl), in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(B);
- o. With respect to **SHANIYA PAULESHA JAQUAIL BROWN**, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is 500 grams or more of cocaine and

50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B);

All in violation of Title 21, United States Code, Section 846.

COUNT 2

THE GRAND JURY FURTHER CHARGES:

That on or about January 19, 2023, in the District of South Carolina, the Defendant, **JAMES JOSEPH YOUNG, III, a/k/a "JJ"**, knowingly, intentionally and unlawfully did possess with intent to distribute and did distribute a quantity of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 3

THE GRAND JURY FURTHER CHARGES:

That on or about February 15, 2023, in the District of South Carolina, the Defendant, **JAMES JOSEPH YOUNG, III, a/k/a "JJ"**, knowingly, intentionally and unlawfully did possess with intent to distribute and did distribute a quantity of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 4

THE GRAND JURY FURTHER CHARGES:

That on or about February 18, 2023, in the District of South Carolina, the Defendant, **JAMES JOSEPH YOUNG, III, a/k/a "JJ"**, knowingly, intentionally and unlawfully did possess with intent to distribute a quantity of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 5

THE GRAND JURY FURTHER CHARGES:

That on or about April 3, 2023, in the District of South Carolina, the Defendant, **RASHAWN LYME BROWN, a/k/a "Strap,"** knowingly, intentionally and unlawfully did possess with intent to distribute and did distribute, a quantity of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 6

THE GRAND JURY FURTHER CHARGES:

That on or about April 3, 2023, in the District of South Carolina, the Defendant, **RASHAWN LYME BROWN, a/k/a "Strap,"** knowingly used and carried a firearm during and in relation to, and did possess a firearm in furtherance of, a drug trafficking crime, as set forth in Count 5, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 7

THE GRAND JURY FURTHER CHARGES:

That on or about April 11, 2023, in the District of South Carolina, the Defendant, **RASHAWN LYME BROWN, a/k/a "Strap,"** knowingly, intentionally and unlawfully did possess with intent to distribute and did distribute a quantity cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 8

THE GRAND JURY FURTHER CHARGES:

That on or about April 30, 2023, in the District of South Carolina, the Defendant, **ZAQUANN ERNEST HAMPTON, a/k/a "Tob,"** knowingly, intentionally and unlawfully did possess with intent to distribute and did distribute quantities of cocaine and a mixture or substance containing a detectable amount of methamphetamine, both Schedule II controlled substances;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 9

THE GRAND JURY FURTHER CHARGES:

That on or about April 30, 2023, in the District of South Carolina, the Defendant, **ZAQUANN ERNEST HAMPTON, a/k/a "Tob,"** knowingly used and carried a firearm during and in relation to, and did possess a firearm in furtherance of, a drug trafficking crime, as set forth in Count 8, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 10

THE GRAND JURY FURTHER CHARGES:

That on or about May 17, 2023, in the District of South Carolina, the Defendant, **ZAQUANN ERNEST HAMPTON, a/k/a "Tob,"** knowingly, intentionally and unlawfully did possess with intent to distribute and did distribute 50 grams or more of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 11

THE GRAND JURY FURTHER CHARGES:

That on or about June 23, 2023, in the District of South Carolina, the Defendants, **BRIANNA ALNISA LAWRENCE**, a/k/a “Bri,” and **ZAQUANN ERNEST HAMPTON**, a/k/a “Tob,” knowingly, intentionally and unlawfully did possess with intent to distribute and did distribute 50 grams or more of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

COUNT 12

THE GRAND JURY FURTHER CHARGES:

That on or about August 8, 2023, in the District of South Carolina, the Defendant, **BRIANNA ALNISA LAWRENCE**, a/k/a “Bri,” knowingly transferred ammunition, that is, one-hundred rounds of 5.56 ammunition, to **ZAQUANN ERNEST HAMPTON**, a/k/a “Tob,” knowing and having reasonable cause to believe that **ZAQUANN ERNEST HAMPTON**, a/k/a “Tob,” had been convicted of a crime punishable by imprisonment for a term exceeding one year;

In violation of Title 18, United States Code, Sections 922(d) and 924(a)(8).

COUNT 13

THE GRAND JURY FURTHER CHARGES:

That on or about December 13, 2023, in the District of South Carolina, the Defendants, **STEPHANIE AMBER HAWKINS** and **JAZIAH SAMONE DRESHA LEWIS**, knowingly, intentionally and unlawfully did possess with intent to distribute 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N- [1- (2-phenylethyl) -4-piperidinyl] propenamide (commonly known as fentanyl), and 50 grams or more of methamphetamine, both

Schedule II controlled substances;

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 14

THE GRAND JURY FURTHER CHARGES:

That on or about December 27, 2023, in the District of South Carolina, the Defendants, **ZAQUANN ERNEST HAMPTON, a/k/a “Tob,”** and **MATTHEW RASHAUN JONES, a/k/a “Savage,”** knowingly, intentionally and unlawfully did possess with intent to distribute quantities of cocaine, cocaine base (commonly known as “crack cocaine”), and a mixture or substance containing a detectable amount of N-phenyl-N- [1- (2-phenylethyl) -4-piperidinyl] propenamide (commonly known as fentanyl), all Schedule II controlled substances;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 15

THE GRAND JURY FURTHER CHARGES:

That on or about December 27, 2023, in the District of South Carolina, the Defendants, **ZAQUANN ERNEST HAMPTON, a/k/a “Tob,”** and **MATTHEW RASHAUN JONES, a/k/a “Savage,”** knowingly used and carried a firearm during and in relation to, and did possess a firearm in furtherance of, a drug trafficking crime, as set forth in Count 14, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 16

THE GRAND JURY FURTHER CHARGES:

That on or about December 27, 2023, in the District of South Carolina, the Defendants,

ZAQUANN ERNEST HAMPTON, a/k/a “Tob,” and MATTHEW RASHAUN JONES, a/k/a “Savage,” knowingly possessed a firearm and ammunition in and affecting commerce, to wit, a Taurus, Model G3, 9mm pistol and 9mm ammunition, both having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, and both knowing they had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT 17

THE GRAND JURY FURTHER CHARGES:

That on or about December 27, 2023, in the District of South Carolina, the Defendant, **OSHALUM GRANT, a/k/a “O Dog,”** knowingly possessed ammunition in and affecting commerce, to wit, 5.56 caliber ammunition, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT 18

THE GRAND JURY FURTHER CHARGES:

That on or about January 3, 2024, in the District of South Carolina, the Defendant, **JAZIAH SAMONE DRESHA LEWIS,** knowingly, intentionally and unlawfully did possess with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substances;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 19

THE GRAND JURY FURTHER CHARGES:

That on or about January 3, 2024, in the District of South Carolina, the Defendants, **JAMIE BROWN, a/k/a “Scrap,”** and **WANDA CATRECE FISHBURNE**, knowingly, intentionally and unlawfully did possess with intent to distribute quantities of cocaine, cocaine base (commonly known as “crack cocaine”), and a mixture or substance containing a detectable amount of N-phenyl-N- [1- (2-phenylethyl) -4-piperidinyl] propenamide (commonly known as fentanyl), all Schedule II controlled substances;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 20

THE GRAND JURY FURTHER CHARGES:

That on or about January 3, 2024, in the District of South Carolina, the Defendants, **JAMIE BROWN, a/k/a “Scrap,”** and **WANDA CATRECE FISHBURNE**, knowingly used and carried firearms during and in relation to, and did possess firearms in furtherance of, a drug trafficking crime, as set forth in Count 19, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 21

THE GRAND JURY FURTHER CHARGES:

That on or about January 3, 2024, in the District of South Carolina, the Defendants, **JAMIE BROWN, a/k/a “Scrap,”** and **WANDA CATRECE FISHBURNE**, knowingly possessed firearms and ammunition in and affecting commerce, to wit, a Mossberg 500A, 12 gauge shotgun, a Hi-Point, Model 4095, .40 caliber rifle, a Savage Arms Corporation, Stevens model 94c, 12 gauge shotgun, .40 caliber ammunition and 12 gauge ammunition, both having previously been convicted

of a crime punishable by imprisonment for a term exceeding one year, and both knowing they had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT 22

THE GRAND JURY FURTHER CHARGES:

That on or about February 2, 2024, in the District of South Carolina, the Defendant, **RASHAWN LYMEL BROWN, a/k/a "Strap,"** knowingly, intentionally and unlawfully did possess with intent to distribute a quantity of marijuana, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).

COUNT 23

THE GRAND JURY FURTHER CHARGES:

That on or about February 2, 2024, in the District of South Carolina, the Defendant, **RASHAWN LYMEL BROWN, a/k/a "Strap,"** knowingly used and carried firearms during and in relation to, and did possess firearms in furtherance of, a drug trafficking crime, as set forth in Count 22, which is prosecutable in a court of the United States, and one such weapon being a rifle having one or more barrels less than sixteen inches in length;

In violation of Title 18, United States Code, Section 924(c)(1)(B)(i).

COUNT 24

THE GRAND JURY FURTHER CHARGES:

That on or about February 2, 2024, in the District of South Carolina, the Defendant, **RASHAWN LYMEL BROWN, a/k/a "Strap,"** knowingly possessed a firearm, to wit, a Palmetto State Armory AR-15 rifle, made in violation of chapter 53 of Title 26, by being a rifle having one or more barrels less than sixteen inches in length;

In violation of Title 26, United States Code, Sections 5822, 5861(c), and 5871.

COUNT 25

THE GRAND JURY FURTHER CHARGES:

That beginning at a time unknown to the Grand Jury, but beginning at least as early as October 2022, and continuing thereafter, up to and including the date of this Superseding Indictment, in the District of South Carolina and elsewhere, the defendants, **SHANIYA PAULESHA JAQUAIL BROWN, JESUS HERIBERTO RAMIREZ GUZMAN,** and [REDACTED] knowingly and willfully did combine, conspire, agree and have tacit understanding with others, both known and unknown to the Grand Jury,

(a) To conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which in fact involved the proceeds of specified unlawful activity, that is, narcotics trafficking, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and further knowing that the transactions were designed, in whole and in part, to conceal and disguise the nature, the location, the source, the ownership, and the control of the property, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

(b) To knowingly engage and attempt to engage in monetary transactions affecting interstate and foreign commerce, involving criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, that is, narcotics trafficking, in violation of Title 18, United States Code, Section 1957;

All in violation of Title 18, United States Code, Section 1956(h).

NOTICE OF SENTENCING ENHANCEMENT

THE GRAND JURY FURTHER CHARGES:

1. Prior to committing the offenses charged in this Indictment, the defendant, **TREVOR COURTNEY FISHBURNE, a/k/a “Shi Town,” a/k/a “Shi”**, had been convicted in General Sessions Court for Colleton County, State of South Carolina, Case Number 2009-GS-15-00294, of armed robbery with a deadly weapon, a *serious violent felony* that has become final. For this conviction, the defendant, **TREVOR COURTNEY FISHBURNE, a/k/a “Shi Town,” a/k/a “Shi”**, *served more than 12 months in prison*. As a result, the defendant, **TREVOR COURTNEY FISHBURNE, a/k/a “Shi Town,” a/k/a “Shi”**, is subject to increased punishment for committing the offenses charged in Count 1 of this Indictment under Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(C), and 851.

2. Prior to committing the offenses charged in this Indictment, the defendant, **RICHARD VERNON DEAS**, had been convicted in General Sessions Court for Charleston County, State of South Carolina, Case Number 2008-GS-10-03339, of murder, a *serious violent felony* that has become final. For this conviction, the defendant, **RICHARD VERNON DEAS**, *served more than 12 months in prison*. As a result, the defendant, **RICHARD VERNON DEAS**, is subject to increased punishment for committing the offenses charged in Count 1 of this Indictment under Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(B), 841(b)(1)(D), and 851.

FORFEITURE

FIREARM/DRUG OFFENSES:

Upon conviction for felony violations of Title 18, 21, and 26 United States Code as charged in this Superseding Indictment, the Defendants, **TREVOR COURTNEY FISHBURNE, a/k/a “Shi Town”, a/k/a “Shi”; ZAQUANN ERNEST HAMPTON, a/k/a “Tob”; JAZIAH SAMONE DRESHA LEWIS; JAMIE BROWN, a/k/a “Scrap”; STEPHANIE AMBER HAWKINS; OSHALUM GRANT, a/k/a “O Dog”; MATTHEW RASHAUN JONES, a/k/a “Savage”; BRIANNA ALNISA LAWRENCE, a/k/a “Bri”; RASHAWN LYME L BROWN, a/k/a “Strap”; BRITTANEY SMITH; JAMES JOSEPH YOUNG, III, a/k/a “JJ”; WANDA CATRECE FISHBURNE; JADEN TYRONE SMITH; RICHARD VERNON DEAS; and SHANIYA PAULESHA JAQUAIL BROWN**, shall forfeit to the United States all of the Defendants’ rights, title, and interest in and to any property, real and personal,

- (a) constituting, or derived from any proceeds the Defendants obtained, directly or indirectly, as the result of such violation(s) of Title 21, United States Code, and all property traceable to such property;
- (b) used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations of Title 21, United States Code;
- (c) any firearms and ammunition (as defined in 18 U.S.C. § 921) –
 - (1) used or intended to be used to facilitate the transportation, sale, receipt, possession or concealment of controlled substances or any proceeds traceable to such property;
 - (2) involved in or used in any knowing violation of 18 U.S.C. § 922 or 924, 26 U.S.C. § 5822 or 5861, or violation of any other criminal law of the United States, or intended to be used in a crime of violence.

MONEY LAUNDERING:

Upon conviction for violations of Title 18, United States Code, Sections 1956 and 1957, as charged in this Superseding Indictment, the Defendants, **SHANIYA PAULESHA JAQUAIL BROWN, JESUS HERIBERTO RAMIREZ GUZMAN, and [REDACTED]**, shall forfeit to the United States any property, real or personal, involved in a transaction or attempted transaction in violations of 18 U.S.C. § 1956 or 1957, as charged in the Superseding Indictment, or any property traceable to such offenses.

PROPERTY:

Pursuant to Title 18, United States Code, Sections 924(d)(1) and 982(a)(1); Title 21, United States Code, Sections 853 and 881; Title 26, United States Code, Section 5872; Title 49, United States Code, Section 80303; and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the Defendants for the offenses charged in this Superseding Indictment includes, but is not limited to, the following:

(a) Firearms:

- (1) Taurus, G3, 9mm pistol
Serial Number: ADC057854
Seized from: Zaquann Ernest Hampton and Matthew Rashaun Jones
- (2) Mossberg 500A, 12 gauge shotgun
Serial Number: L342116
Seized from: Jamie Brown and Wanda Catrece Fishburne
- (3) Hi-Point, Model 4095, .40 caliber rifle
Serial Number: H78636
Seized from: Jamie Brown and Wanda Catrece Fishburne
- (4) Savage Arms Corporation, Stevens model 94c 12 gauge shotgun
Serial Number: None
Seized from: Jamie Brown and Wanda Catrece Fishburne

- (5) Palmetto State Armory AR-15
Serial Number: SCB920726
Seized from: Rashawn Lymel Brown

(b) Ammunition:

- (1) Miscellaneous rounds of 9mm ammunition
Seized from: Zaquann Ernest Hampton and Matthew Rashaun Jones
- (2) Miscellaneous rounds of 5.56 caliber ammunition
Seized from: Oshalum Grant
- (3) Miscellaneous rounds of 5.56 caliber ammunition
Seized from: Rashawn Lymel Brown
- (4) Miscellaneous rounds of .40 caliber ammunition
Seized from: Jamie Brown and Wanda Catrece Fishburne
- (5) 12 gauge ammunition
Seized from: Jamie Brown and Wanda Catrece Fishburne

(c) Proceeds/Forfeiture Judgment:

A sum of money equal to all property the Defendants obtained as a result of the drug offenses charged in the Superseding Indictment, and all interest and proceeds traceable thereto as a result of their violations of 21 U.S.C. §§ 841 and 846.

(d) Money Laundering/Forfeiture Judgment:

A sum of money equal to all property involved in the money laundering offenses charged in the Superseding Indictment, and all interest and proceeds traceable thereto, for which the Defendants are liable as the result of their violations of 18 U.S.C. §§ 1956 and 1957.

SUBSTITUTION OF ASSETS:

If any of the property described above as being subject to forfeiture, as a result of any act or omission of a Defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of the Defendant up to an amount equivalent to the value of the above-described forfeitable property;

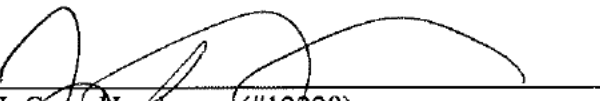
Pursuant to Title 18, United States Code, Sections 924(d)(1) and 982(a)(1); Title 21, United States Code, Sections 853 and 881; Title 26, United States Code, Section 5872; Title 49, United States Code, Section 80303; and Title 28, United States Code, Section 2461(c).

A True BILL



FOREPERSON

ADAIR F. BOROUGHS
UNITED STATES ATTORNEY

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